



September 19, 2018

Science Advisory Board
US Environmental Protection Agency
Washington, DC

RE: Comments from the US Industrial Pellet Association on SAB Draft Report on EPA's 2014 Draft "Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources"

The US Industrial Pellet Association (USIPA) appreciates the opportunity to submit comments to the EPA Science Advisory Board (SAB) relating to the latest draft SAB report on biogenic carbon emissions. We appreciate the work that has been done by EPA and the SAB over the last several years and are hopeful that a conclusion can be reached on this issue in order to provide regulatory certainty around biogenic carbon accounting.

USIPA represents industrial-grade wood pellet manufacturers based in the US Southeast who are actively exporting their product for large-scale power production in Europe and Asia. Our members are using lower-grade wood fiber to create a low-cost, low-carbon alternative to fossil fuels. Using biomass for power production lowers carbon emissions by up to 90% when compared to coal. Wood pellets can be co-fired alongside fossil fuels, or can serve as stabilizing back-up power alongside other renewables like solar and wind.

Regulatory certainty is critical for the success of any industry, and bioenergy is no different. In order for renewables to compete on a global scale, government regulatory frameworks must be based on leading science and must be practical to implement. We have advocated to the SAB during this process that an anticipated future baseline or counterfactual modeling approach is unworkable because it is highly complex, makes arbitrary assumptions about future condition of forests, and suggests counterfactual scenarios that are subjective and impossible to predict. We are pleased to see that the most recent report from SAB (August 29, 2018) rightly expresses these same concerns over the complexity of using this approach for policy purposes.

We are also in agreement with the conclusions in the August 29 report which indicate that an accounting system which relies on measuring changes in carbon stocks at the landscape or regional level is more appropriate and practical. This type of approach is taken in the EU and is supported by carbon science, and is both practically applicable as well as environmentally sound. Thanks to this policy, the EU has a strong market for sustainably-sourced bioenergy, which displaces the use of fossil fuels, while also keeping energy systems balanced and costs stable.

Thank you for your consideration of these comments. We hope that your work here will provide the regulatory certainty necessary to make the US a leader in smart energy policies that encourage the use of low-carbon fuels such as biomass.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Ginther", written in a cursive style.

Seth Ginther
Executive Director
US Industrial Pellet Association (USIPA)